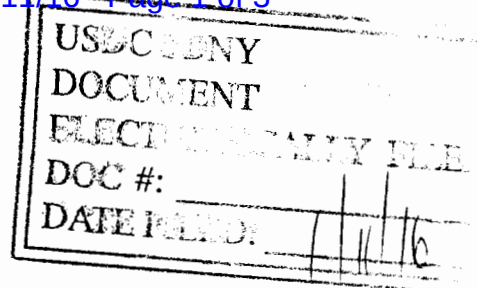


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKIN RE PETROBRAS SECURITIES
LITIGATION

14-cv-9662 (JSR)

[PROPOSED] AMENDED CIVIL CASE MANAGEMENT PLAN

**The Court requires that this case shall be ready for trial on
September 19, 2016.**

After consultation with counsel for the parties, the following Amended Case Management Plan is adopted, which amends certain scheduling matters as set forth herein. This plan is also a scheduling order pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure. Initially capitalized terms not otherwise defined herein have the meanings ascribed to them in the Court's Order Coordinating Pre-Trial Matters (D.I. 195, 8/3/2015).

A. Any Individual Action filed after December 31, 2015, will automatically be stayed in all respects until after the completion of the aforesaid trial *scheduled to begin 9/19/16.*

B. Discovery (in addition to the disclosures required by Fed. R. Civ. P. 26(a)):

1. Documents. Document requests may be served as required, but no document request may be served later than 30 days prior to the date of the close of discovery as set forth in item 6 below.

2. Experts. Every party-proponent of a claim (including any counterclaim, cross-claim, or third-party claim) that intends to offer expert testimony in respect of such claim must make the disclosures required by Fed. R. Civ. P. 26(a)(2) by May 6, 2016. Every party-opponent of such claim that intends to offer expert testimony in opposition to such claim must make the disclosures required by Fed. R. Civ. P. 26(a)(2) by May 27, 2016. No expert testimony (whether designated as "rebuttal" or otherwise) will be permitted by other experts or beyond the scope of the opinions covered by the aforesaid disclosures except upon prior express permission of the Court, application for which must be made no later than 10 days after the date specified in the immediately preceding sentence. All experts may be deposed, and such depositions must be completed by June 15, 2016.

3. Depositions. Except as set forth below, all witness depositions must be completed by April 29, 2016. Unless counsel agree otherwise or the Court so orders, depositions shall not commence until all parties have completed the initial disclosures required by Fed. R. Civ. P. 26(a)(1), ~~or until four weeks from the date of this Order, whichever is earlier.~~ Depositions shall proceed concurrently, with no party having priority, and no deposition shall extend beyond one business day without prior leave of the Court. All depositions taken of Individual Plaintiffs and related third parties on issues that are unique to the Individual Actions must be completed by May 30, 2016.

4. Document Production. The parties are under an obligation to complete their production of documents as soon as practicable after being served with document requests. The parties in the Class Action shall ^{make} ~~make~~ all reasonable efforts to substantially complete the production of documents by January 1, 2016 in response to any document requests served by September 1, 2015. Plaintiffs in the Individual Actions shall make all reasonable efforts to substantially complete the production of documents by January 31, 2016.

5. Requests to Admit. Requests to Admit, if any, must be served by March 30, 2016.

6. Except as set forth above with respect to the Individual Actions, all discovery is to be completed by April 29, 2016. Interim deadlines for items 1-6 above may be extended by the parties on consent without application to the Court, provided the parties are certain they can still meet the discovery completion date set forth in this paragraph. The discovery completion date may be adjourned only upon a showing to the Court of extraordinary circumstances, and may not be extended on consent.

C. Summary Judgment:

1. Post-discovery summary judgment motions in the form prescribed by the Court's Individual Rules of Practice may be brought on without further consultation with the Court provided that a Notice of any such motion, in the form specified in the Court's Individual Rules of Practice, is filed no later than June 20, 2016, and provided that the moving papers are served by June 27, 2016, answering papers by July 18, 2016, and reply papers by July 29, 2016. Each party must file its respective papers with the Clerk of the Court on the same date that such papers are served. Additionally, on the same date that any papers are served and filed, counsel filing and serving the papers must arrange to deliver courtesy non-electronic hard copies to the Courthouse for delivery to Chambers.


2. On issues that are unique to Individual Actions, post-discovery summary judgment in the form prescribed by the Court's Individual Rules of Practice may be brought on without further consultation with the Court provided that a Notice of any such motion, in the form specified in the Court's Individual Rules of Practice, is filed no later than July 29, 2016, provided that the moving papers are served by August 5, 2016, answering papers by August 22, 2016, and reply papers by August 31, 2016. Each party must file its respective papers with the Clerk of the Court on the same date that such papers are served. Additionally, on the same date that any papers are served and filed, counsel filing and serving the papers must arrange to deliver courtesy non-electronic hard copies to the Courthouse for delivery to Chambers. No oral argument will be heard on these motions.

D. A final pre-trial conference, as well as oral argument on any post-discovery summary judgment motions, shall be held on 8/5/16 at 2pm. [date to be inserted by the Court]. The timing and other requirements for the Joint Pretrial Order and/or other pre-trial submissions shall be governed by the Court's Individual Rules of Practice. The actual trial date shall under no circumstances be later than September 19, 2016.

E. All motions and applications shall be governed by Judge Rakoff's Individual Rules of Practice. Counsel shall promptly familiarize themselves with all of the Court's Individual Rules, as well as with the Local Rules for the United States District Court for the Southern District of New York.

Filed under C. above

SO ORDERED.



JED S. RAKOFF
U.S.D.J.

DATED: New York, New York

1/8/16